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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Public Notice)	
)	
Additional Comment Sought In)	
Wireless Enhanced 911 Reconsideration Proceeding)	CC Docket No. 94-102
Regarding Rules And Schedules)	

**ADDITIONAL COMMENTS OF THE PERSONAL
COMMUNICATIONS INDUSTRY ASSOCIATION**

The Personal Communications Industry Association ("PCIA"),¹ by its attorneys, hereby submits its additional comments on the Commission's *Public Notice* in the above-captioned proceeding.² PCIA believes the consensus between wireless carriers and the public safety community embodied in the Joint Letter is a monumental advance in bringing enhanced 9-1-1 (E911) capabilities to the public. PCIA supports the positions taken in the letter as a reasonable compromise between the needs of public safety agencies, the technical capabilities of wireless systems, and the needs of the public at large. Accordingly, the Commission should enact the

¹ PCIA is the international trade association created to represent the interests of both the commercial and the private mobile radio service communications industries. PCIA's Federation of Councils includes: the Paging and Narrowband PCS Alliance, the Broadband PCS Alliance, the Site Owners and Managers Association, the Association of Wireless Communications Engineers and Technicians, the Private Systems Users Alliance, and the Mobile Wireless Communications Alliance. In addition, as the FCC-appointed frequency coordinator for the 450-512 MHz bands in the Business Radio Service, the 800 and 900 MHz Business Pools, the 800 MHz General Category frequencies for Business Eligibles and conventional SMR systems, and the 929 MHz paging frequencies, PCIA represents and serves the interests of tens of thousands of licensees.

² *FCC Public Notice, "Additional Comment Sought In Wireless Enhanced 911 Reconsideration Proceeding Regarding Rules and Schedules," DA 97-2751 (Oct. 3, 1997) ("Public Notice").*

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modifications to its rules suggested in the Joint Letter notwithstanding the technically inaccurate objections of the Ad Hoc Alliance for Public Access to 911 (“Ad Hoc Alliance”).

I. INTRODUCTION AND SUMMARY

After years of protracted negotiations and regulatory proceedings, PCIA, the Cellular Telecommunications Industry Association (“CTIA”), the Association of Public Safety Officials-International, Inc. (“APCO”), the National Emergency Number Association (“NENA”), and the National Association of State Nine-One-One Administrators (“NASNA”) met and jointly achieved a groundbreaking compromise on the delivery of wireless E911 for the public. This compromise is embodied in a September 25, 1997 letter requesting the Commission modify its *E911 Report and Order*³ by: (1) eliminating any reference to the term “code identification;” (2) delaying the implementation of PSAP-by-PSAP choice until Phase II technology is in place; and (3) extending for 18 months the October 1, 1997 deadline for the implementation of 911 services over digital wireless systems for TTY/TDD users.⁴

This Joint Letter followed a supplemental comment round in which the E911 Wireless Coalition — of which PCIA is a member — refuted a number of technical allegations the Ad Hoc Alliance had made regarding the provision of wireless E911 service, especially the ability of current wireless technologies to provide a call back number to PSAPs.⁵ Specifically, the

³ *Revision of the Commission’s Rules to Ensure Compatibility With Enhanced 911 Emergency Calling Systems*, 61 Fed. Reg. 40348 (1996) (“*E911 Report and Order*”).

⁴ Letter from PCIA, CTIA, APCO, NENA, and NASNA to Chairman Reed Hundt (Sept. 25, 1997) (“Joint Letter”).

⁵ Comments of the E911 Wireless Coalition, CC Docket 94-102 (filed Aug. 8, 1997). *See also* Letter from E911 Wireless Coalition to Mr. John Cimko, Chief, Policy Division, (Continued...)

Wireless E911 Coalition demonstrated that, contrary to the contentions of the Ad Hoc Alliance, the current installed base of wireless mobile switches cannot utilize "pseudo-MIN" for call back purposes.⁶ In addition, the Coalition pointed out that the Ad Hoc Alliance's proposal failed entirely to address the call back capabilities of Global System for Mobile/PCS1900 ("GSM") technology.⁷

Notwithstanding the consensus agreement achieved between the wireless industry and the public safety community and leadership, the Ad Hoc Alliance continues to misrepresent the technical capabilities of wireless networks and opposes the negotiated resolution of issues in the Joint Letter. The Ad Hoc Alliance states that, as currently configured, cellular switches are capable of providing call back information through the use of "pseudo-ANI." As detailed below, this contention has no merit, and should be dismissed by the Commission.

II. THE PROPOSED MODIFICATIONS REPRESENT A CAREFULLY STRUCK COMPROMISE BETWEEN THE TECHNICAL CAPABILITIES OF CARRIERS AND THE NEEDS OF PUBLIC SAFETY AGENCIES, AND SHOULD NOT BE DISTURBED

The signatories to the Joint Letter are not engaged in "ceaseless efforts ... to reinstate blocking of emergency calls."⁸ To the contrary, the proposed modifications to the *Report and Order* contained in the Joint Letter represent a mutually agreed upon set of standards that arose

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Wireless Telecommunications Bureau (July 10, 1997) (answering technical questions regarding the ability of CMRS providers to meet the Phase I E911 requirements).

⁶ *Id.* at 4-7.

⁷ *Id.* at 7-9.

⁸ Letter from Ad Hoc Alliance to Chairman Hundt at 3 (Sept. 30, 1997) ("Ad Hoc (Continued...)")

out of a meeting between wireless trade associations and the representatives of public safety agencies. These modifications represent a voluntary, good faith effort to match the needs of public safety officials with the capabilities of wireless networks. APCO, NENA and NASNA were not — as claimed by the Ad Hoc Alliance — “persuaded to put their names on this request.”⁹

In addition, the Ad Hoc Alliance’s invitation to participate in the meeting was not “withdrawn at the insistence of CTIA/PCIA.”¹⁰ Rather, attendance at this meeting was deliberately limited to carrier organizations and recognized public safety organizations in order to increase the chance that consensus would be reached, given the limited amount of time with which they had to work. PCIA remains committed to working with all interested parties — including the Ad Hoc Alliance — to continue to negotiate reasonable solutions to questions involving wireless E911 implementation.

As reflected in the Joint Letter, the public safety community has stated that PSAPs need the flexibility to choose between receiving all wireless 911 calls and wireless 911 calls that they can trace to valid subscribers. For certain PSAPs, this traceability is an essential safety requirement for their emergency personnel.

(...Continued)
Alliance Ex Parte”).

⁹ *Id.* at 1.

¹⁰ *Id.* at 3.

As defined in the Commission's *E911 Report and Order*, "code identification" is based on the presence or absence of a mobile identification number ("MIN").¹¹ This MIN-based definition will not, however, ensure that PSAPs are able to trace a wireless 911 call, because the MIN does not serve as a unique identifier.¹² Therefore, the public safety community and wireless carriers have agreed to substitute the term "successfully validated calls" for "code identified calls." By requiring calls to pass a wireless switch's service validation process, public safety officials will be able to ensure that the call can be traced.

Further, until wireless ALI is implemented, the decision whether to route all calls, or only traceable calls must be made, at a minimum, on a switch-by-switch basis rather than a PSAP-by-PSAP basis, because a single switch can serve numerous PSAPs. When ALI is in place, a customer's location could, in most cases, be correlated with the serving PSAP, and *then* the PSAP could consider the choice of receiving "all 9-1-1 wireless calls" or only traceable calls. As the parties recognized in the Joint Letter, however, some misrouting can be expected due to the vagaries of radio propagation, and accommodations will need to be made.

The Ad Hoc Alliance continues to misstate the ability of wireless carriers to provide a call back number for non-validly subscribed customers.¹³ As the Wireless E911 Coalition demonstrated in great detail, such "pseudo-MIN" based call back capability is technically

¹¹ See 47 C.F.R. § 20.3.

¹² See Letter from E911 Wireless Coalition to Mr. John Cimko at 10 (Question 8).

¹³ See, e.g., Ad Hoc Alliance Ex Parte at 2 ("There is no reason why a pseudo-ANI cannot be assigned by the carrier to the mobile unit at the time the emergency call is placed and thus provide call back capability to the PSAP for all handsets without regard to the user's status").

infeasible.¹⁴ Even if such call back were possible, however, it would still not address the need of public safety officials to be able to trace the call to a specific subscriber, and could therefore place rescue workers at risk. Finally, the Ad Hoc Alliance's proposal to use "pseudo-ANI" for call back information is not reconcilable with the Commission's decision to reserve this data string for cell site information.¹⁵

The Ad Hoc Alliance also remains confused about the limitations of GSM/PCS1900 technology, stating that "there is no dispute that a caller using a GSM handset can be called back, even if service has never been initialized." In fact, the Wireless E911 Coalition has demonstrated that in GSM systems, call back cannot be provided for mobiles that are missing Subscriber Identity Modules ("SIM") cards or for roamers that failed registration.¹⁶

Finally, PCIA reiterates its request that the Commission grant the industry an 18 month extension of the deadline for implementing 911 services over wireless systems for TTY/TDD users.¹⁷ As noted in PCIA's earlier filing, despite the diligent efforts of carriers, manufacturers, and standards setting bodies, numerous technical obstacles remain with respect to passing TTY

¹⁴ In its earlier filing, the Ad Hoc Alliance stated that call back for non-successfully validated customers can be accomplished through the use of "pseudo-MIN." Letter from Ad Hoc Alliance to Mr. John Cimko, Chief, Policy Division, Wireless Telecommunications Bureau at 2-3 (July 11, 1997). Now the Ad Hoc Alliance states that call back can be accomplished through the use of "pseudo-ANI." In either case, such call back is impossible, unless the call has passed the wireless carrier's switch validation process. Comments of the E911 Wireless Coalition at 4-7.

¹⁵ 47 C.F.R. § 20.3.

¹⁶ Comments of the E911 Wireless Coalition at 7-9.

¹⁷ Request for Extension of Time to Implement E911/TTY Compatibility Requirements for Wireless Operators (Aug. 27, 1997).

signaling through the analog-digital (*i.e.*, vocoders) and digital-analog converters used by all digital wireless technologies. Even for some analog technologies, certain interface issues remain unresolved. Therefore, this 18 month extension is necessary to allow the industry to resolve these technical issues.


III. CONCLUSION

The signatories to the Joint Letter have expended a great deal of effort in negotiating a resolution to issues raised in response to modifications to the *E911 Report and Order* that serve the interests of both wireless carriers and public officials and the public. Given their broad base of support, the Commission should adopt these proposals.

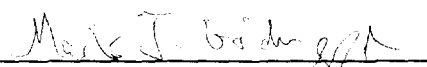
Respectfully submitted,

PERSONAL COMMUNICATIONS INDUSTRY ASSOCIATION

By:


Eric W. DeSilva
Stephen J. Rosen
WILEY, REIN & FIELDING
1776 K Street, NW
Washington, DC 20006
(202) 429-7000

By:


Mark J. Golden,
Senior Vice President, Industry Affairs
Mary E. Madigan,
Vice President, External Affairs
PERSONAL COMMUNICATIONS
INDUSTRY ASSOCIATION
500 Montgomery Street, Suite 700
Alexandria, VA 22314-1561
(703) 739-0300

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